

FILED

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5/31/2013

U.S. DISTRICT COURT
CLARKSBURG, WV 26301

Judge Keeley

In with this letter is A motion filed by pro se to Remove Tom Dyer from my case. As you know. If you refuse to do so it is only showing bias/prejudice, its grounds for an appeal. I am asking for the court to work with me and grant me this motion i've asked for out of town counsel if not then Appoint another attorney other then Tom Dyer, I've made copies of this motion and letter I'm sending the court the original and I'm keeping the copies for my record. You gave me two weeks which is 14 business days. I have been contacting you for several days now, I have the letters to prove this if the courts prefer me to represent myself with stand by counsel then bring me forth to discuss this before the court we are running out of time. Thank you for your time in this matter.

Sincerely
Gwen LaVelle

UNITED STATES DISTRICT COURT for THE
NORTHERN DISTRICT of WEST VIRGINIA

5/31/2013

UNITED STATES OF AMERICA

PLAINTIFF

v.

CHARLES ADKINS,

Criminal Action No.

1:13 CR 17

Motion

To REMOVE ATTORNEY

Thomas DYER from case no. 1:13CR17

Comes now I the defendant CHARLES ADKINS by way of Pro se and respectfully moves The Court To REMOVE ATTORNEY Thomas DYER from Case No. 1:13CR17 and in support states The following

A. There Is no ATTORNEY and client relationship between I The defendant CHARLES ADKINS and ATTORNEY Thomas DYER. Mr. DYER has disrespected me as his client, and insinuated Tha I am dumb and HE has verbally belittled ME and HE WILL NOT send ME a COPY of the Witness List and THE GRAND Jury TRANSCRIPTS.

C.C. COPY

Pg 2 of 2

B. MR DYER WILL NOT SEND ME A COPY OF THE DISCOVERY PACKET, STATEMENTS AND THE AUDIO TAPE TO HEAR AND HIS ATTITUDE IS THAT OF A LACK OF CONSIDERATION.

I DO NOT TRUST ATTORNEY THOMAS DYER. I HAVE CONTACTED THE LAWYER DISCIPLINARY BOARD IN CHARLESTON WV. MR DYER SHOWS NO CONCERN IN MY BEST INTEREST IN THE MATTER I AM SUFFERING FROM INEFFECTIVE ASSISTANT OF COUNSEL THAT WAS PRESIDENCED IN STRICKLYN VS. WASHINGTON.

C. I KNOW ABOUT DUE PROCESS LAW, 5TH AMENDMENT RIGHTS. AND I KNOW ABOUT INEFFECTIVE ASSISTANT OF COUNSEL. I WILL NOT SEE OR HAVE A FAIR AND IMPARTIAL JURY TRIAL WITH ATTORNEY THOMAS DYER AS ATTORNEY ON CASE NO 1:13-CR-17 SO I THE DEFENDANT CHARLES ADKINS RESPECTFULLY MOVES THE COURT TO REMOVE ATTORNEY THOMAS DYER FROM MY CASE, CASE NO 1:13-CR-17, AND APPOINT OUT OF TOWN COUNSEL TO REPRESENT ME IN THIS MATTER.

RESPECTFULLY SUBMITTED

CHARLES LEE ADKINS

Charles Lee Adkins

C.C. COPY

Dear Judge Keeley

5/30/2013

I am briefly going to mention to you that I do not trust or respect Thomas Dyer. He has disrespected me, my witnesses, as well as my friends. He has allowed my rights to be violated. He works closely with the prosecution so that is a conflict of interest for me. He knew my witnesses were being harassed and or threatened. Forced to change their statements. You Honorable Judge have been in this line of work for many years. You were at one time a defense attorney that I am aware of and represented a family member of mine. After all of these years I would think that you would have a sharp eye and a close eye on each and every case that is before you and in this case something is most definately wrong. When this was a state case I had witnesses when it became a federal case I lost my witnesses. Attorney Dyer told me that the courts in this area doesn't see a lot of cases like mine and that the cases in this area like mine stay at the state level and don't go to the federal level. It was Mr. Dyer who told me that it was the US prosecuting attorney and you honorable judge who insinuated that I was buttering up to the 10yr old girl Morrigan just to get her trust so I could sexually molest her. It was Mr. Dyer who said that my witnesses and friends was Mr. and Mrs. nobodys, people who ammount to nothing. I do not trust Mr. Dyer and I have some doubt in the federal court in Clarksburg, Harrison County.

2042

In all honesty I could represent myself. I've did it in the past in both federal and state court, this I can prove. However, in this case unlike the other cases I have 6 or more indictments pending against me and I will most likely have a jury trial and again in all honesty I would rather have an attorney to represent me. But it can't be Tom Dyer or Dyer Lawfirm. So I will ask for the Honorable Court to appoint out of town counsel to represent me in this matter. Counsel from Parkersburg, Wheeling, Beckley, Charleston, Morgantown, or any other area besides Clarksburg, Harrison County. After what I have experienced with these last 2 attorneys in this case I'de have been best off to keep Richard Walker as my attorney. Above all Honorable Judge Keeley I will represent myself before I let Tom Dyer or Dyer Lawfirm take part in this case. As for my friends and family hiring private counsel for me that is not over with for me. It is just a timely process. My friends and family must take out loans on there homes and automobiles to have the money to hire private counsel for me. This takes time, time that I don't have. I do not care about the Dyer Lawfirms reputation there are other inmates in this jail that Tom Dyer has mislead and let down. I assure the honorable court that if this be granted to me I will not ask for another attorney again in this case. Thank you for your time. Sincerley

Charles Adkins

5-30-13

DEAR Judge Keeley

I need to know why you ARE bias towards me? You ARE Refusing to Answer my Request, you ARE forcing me to KEEP Tom Dyer, After I have turned him in to the Disciplinary committee. You have allowed the U.S. MARSHALS to place me in a facility that is not in compliance with state OR federal Regulation, my Right to go to RECREATION and to get FRESH AIR is sometimes denied and at times I only receive 15 mins of Rec. I'm locked down 23 hrs a day so that stops me from RESEARCH AND STUDYING, so I can't represent myself and prepare for trial, And that violates my due process Rights, "5th Amendment". You have told me you will not give me a continuance on this case if needed that alone is bias, you have falsely accused me of butteering up to a 10yes old girl, just to get her trust AND to molest her that is a false allegation. I have turned you into the Judicial committee, because of the way you ARE handling this case AND because of your biased opinion AND Attitude towards me. I have asked you to give me a fair trial, that will not happen in your court, you won't even give me an out of town counsel to represent me on this case OR move me to a facility to where im not locked down all the time OR move me to a Facility where I can prepare for trial. If not I would need a continuance on the trial date, but you refuse to do that. I'm being HARASSED AND mistreated by STAFF here, but you allow Federal marshals to keep me here. Do you not care that I HAVE turned you AND Tom Dyer into the Disciplinary committee AND the Judicial committee?

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So based on the outcome of this case it will show that I have had a problem with you and Tom Dyer, since the beginning of this case, please contact me as soon as possible to let me know what your decision is going to be.

My family and friends will continue to contact the Judicial Committee As well as the disciplinary committee as long as I'm being mistreated. We are running out of time please contact me as soon as possible and for the last time Remove Tom Dyer from my case. Thank you for your time

Charles Lee Adkins
Sincerely

CHARLES LEE ADKINS

2578011 case no. 1:13-cr-00017